

Exhibit E

From: Leach, Robert (USACAN) <Robert.Leach@usdoj.gov>
Sent: Thursday, May 14, 2020 4:26 PM
To: Trefz, Katherine; Wade, Lance; 'Coopersmith, Jeffrey'
Cc: Downey, Kevin; Saharia, Amy; 'Cazares, Stephen'; 'Brown, Walter F. (wbrown@orrick.com)'; 'Luskey, Randy'; Schenk, Jeffrey (USACAN); Bostic, John (USACAN); Baehr-Jones, Vanessa (USACAN); Nedrow, Jeff (USACAN); 'John Cline' RE: US v. Holmes & Balwani: Rule 16(a)(1)(G) Notice
Subject:

Dear Counsel,

We received your March 12 and May 6 letters. Our disclosures with respect to Drs. Linnerson, Zachman, Embry, Szmuc, Asin, Acharya, and Page are more than sufficient. We decline your request that we supplement our disclosures. If we interview any of them further we will produce the agent notes and any interview memorandum that is prepared.

With respect to Dr. Master, we will produce any responsive material in the government's possession. We anticipate the production will go out by May 28. We are unaware of any authority requiring the government to produce documents in the possession, custody, or control of a retained expert. If you are aware of such authority, please provide it.

Best regards,

Bob

From: Trefz, Katherine <KTrefz@wc.com>
Sent: Wednesday, May 6, 2020 11:25 AM
To: Leach, Robert (USACAN) <RLeach@usa.doj.gov>; Wade, Lance <LWade@wc.com>; 'Coopersmith, Jeffrey' <jcoopersmith@orrick.com>
Cc: Downey, Kevin <KDowney@wc.com>; Saharia, Amy <ASaharia@wc.com>; 'Cazares, Stephen' <scnazares@orrick.com>; 'Brown, Walter F. (wbrown@orrick.com)' <wbrown@orrick.com>; 'Luskey, Randy' <rluskey@orrick.com>; Schenk, Jeffrey (USACAN) <JSchenk@usa.doj.gov>; Bostic, John (USACAN) <jbostic@usa.doj.gov>; Baehr-Jones, Vanessa (USACAN) <vbaehr-jones@usa.doj.gov>; Nedrow, Jeff (USACAN) <JNedrow@usa.doj.gov>; 'John Cline' <cline@johndclinelaw.com>
Subject: RE: US v. Holmes & Balwani: Rule 16(a)(1)(G) Notice

All,

Please see the attached.

Katie Trefz
Williams & Connolly LLP
725 Twelfth St., NW Washington, DC 20005
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From: Trefz, Katherine
Sent: Thursday, March 12, 2020 3:52 PM
To: 'Leach, Robert (USACAN)' <Robert.Leach@usdoj.gov>; Wade, Lance <LWade@wc.com>; 'Coopersmith, Jeffrey' <jcoopersmith@orrick.com>
Cc: Downey, Kevin <KDowney@wc.com>; Saharia, Amy <ASaharia@wc.com>; 'Cazares, Stephen' <scnazares@orrick.com>; 'Brown, Walter F. (wbrown@orrick.com)' <wbrown@orrick.com>; 'Luskey, Randy'

<rsluskey@orrick.com>; 'Schenk, Jeffrey (USACAN)' <Jeffrey.B.Schenk@usdoj.gov>; 'Bostic, John (USACAN)' <John.Bostic@usdoj.gov>; 'Baehr-Jones, Vanessa (USACAN)' <Vanessa.Baehr-Jones@usdoj.gov>; 'Nedrow, Jeff (USACAN)' <Jeff.Nedrow@usdoj.gov>; 'John Cline' <cline@johndclinelaw.com>
Subject: RE: US v. Holmes & Balwani: Rule 16(a)(1)(G) Notice

Counsel,

Please see the attached.

Katie

Katie Trefz

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From: Trefz, Katherine

Sent: Monday, March 09, 2020 5:42 PM

To: Leach, Robert (USACAN) <Robert.Leach@usdoj.gov>; Wade, Lance <LWade@wc.com>; Coopersmith, Jeffrey <jcoopersmith@orrick.com>

Cc: Downey, Kevin <KDowney@wc.com>; Saharia, Amy <ASaharia@wc.com>; 'Cazares, Stephen' <scazares@orrick.com>; Brown, Walter F. <wbrown@orrick.com> <wbrown@orrick.com>; Luskey, Randy <rsluskey@orrick.com>; Schenk, Jeffrey (USACAN) <Jeffrey.B.Schenk@usdoj.gov>; Bostic, John (USACAN) <John.Bostic@usdoj.gov>; Baehr-Jones, Vanessa (USACAN) <Vanessa.Baehr-Jones@usdoj.gov>; Nedrow, Jeff (USACAN) <Jeff.Nedrow@usdoj.gov>; John Cline <cline@johndclinelaw.com>

Subject: RE: US v. Holmes & Balwani: Rule 16(a)(1)(G) Notice

Bob,

Please produce (or identify in the government's productions) notes or memoranda of any government interviews or meetings with, or testimony of, the following individuals identified in the government's letter:

JoEllen B. Embry

Dr. Edward Szmuc

Dr. Gerald S. Asin

Dr. Govind Acharya

Dr. Curtis Page

Thank you,

Katie

Katie Trefz

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From: Leach, Robert (USACAN) <Robert.Leach@usdoj.gov>

Sent: Friday, March 06, 2020 11:49 PM

To: Wade, Lance <LWade@wc.com>; Coopersmith, Jeffrey <jcoopersmith@orrick.com>

Cc: Downey, Kevin <KDowney@wc.com>; Saharia, Amy <ASaharia@wc.com>; Trefz, Katherine <KTrefz@wc.com>; 'Cazares, Stephen' <scazares@orrick.com>; Brown, Walter F. (wbrown@orrick.com) <wbrown@orrick.com>; Luskey, Randy <rluskey@orrick.com>; Schenk, Jeffrey (USACAN) <Jeffrey.B.Schenk@usdoj.gov>; Bostic, John (USACAN) <John.Bostic@usdoj.gov>; Baehr-Jones, Vanessa (USACAN) <Vanessa.Baehr-Jones@usdoj.gov>; Nedrow, Jeff (USACAN) <Jeff.Nedrow@usdoj.gov>

Subject: US v. Holmes & Balwani: Rule 16(a)(1)(G) Notice

Dear Counsel,

Please see the attached.

Best regards,
Bob

Robert S. Leach
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